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November 11, 2015

VIA FEDERAL EXPRESS

Hon. Helen S. Ferrara Regional Judicial Officer U.S. Environmental Protection Agency 290 Broadway, 16th Floor New York, New York 10007-1866

Re:

Mack Studios, Inc. - Docket No. CWA-02-2015-3404

Request for Additional Extension

Dear Judge Ferrara:

The U.S. Environmental Protection Agency ("EPA") extended the time for Mack Studios, Inc. and Peter Maciulewicz to answer the Administrative Complaint (the "Complaint") in the referenced matter until November 16, 2015.

This letter is submitted to request an additional extension of time until January 15, 2016 to serve an answer to the Complaint and, if necessary, to request a hearing in this matter. The parties have reached a settlement in principle, and EPA will soon be providing a Consent Agreement/Final Order ("CAFO") for review. It is our expectation that a mutually agreeable CAFO can be finalized within the next two months. Please note that EPA Assistant Regional Counsel Tim Murphy has consented to this request.

We are submitting the original of this letter and one copy to Karen Maples, the Regional Hearing Clerk, and an electronic copy of this letter to Mr. Murphy.



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Thank you for your time and consideration, and please call if you have questions.

Sincerely,

BOND, SCHOENECK & KING, PLLC

By:

Robert R. Tyson

Att:

Certificate of Service

CC:

Tim Murphy, Esq. (via e-mail only)

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